

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE UNITED STATES OF AMERICA
Plaintiff,

vs.

CASE NO. 17-596-018 (PAD)

DAN JOSEPH RODRIGUEZ-LARACUENTE
Defendant

MOTION NOTIFYING VIOLATIONS OF CONDITIONS OF RELEASE AND
REQUESTING THE ISSUANCE OF AN ARREST WARRANT

TO THE HONORABLE PEDRO A. DELGADO
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO

COMES NOW, FRANKLIN CASTILLO-FERNANDEZ, U.S. PROBATION OFFICER

of this Court, providing the following information pursuant to Court order:

1. On January 12, 2018, the defendant was ordered released on a \$10,000 unsecured bond by the Honorable U.S. Magistrate Judge Camille L. Velez-Rive along with pretrial services supervision and other conditions of release.
2. On June 25, 2021, a call was received from Sargent Marquez of the Puerto Rico Police Department (PRPD) notifying that Mr. Rodriguez-Laracuate had a domestic violence complaint lodged against him (Q-2021-7-132-3702) by Mrs. Nanette Zoraida Melendez-Urbina, his consensual partner, for which he was arrested and taken into custody.
3. According to the complaint and information obtained from the PRPD Bayamon Domestic Violence Unit, on Friday June 25, 2021, at 0830, the defendant grabbed Mrs. Nanette Zoraida Melendez-Urbina by the arm, pulled her out of

her vehicle and forcibly kissed her, creating a small bruise.

4. As verified, on June 27, 2021, Bayamon Municipal Judge Catherine Brunette found cause for the aforementioned charges. A bond with electronic monitoring supervision was imposed. However, as of the filing of this motion Mr. Rodriguez-Laracuenta has not posted bail and remains detained at the Bayamon Correctional Facility 705.

According to the aforementioned information, Mr. Rodriguez-Laracuenta appears to be in violation of the following conditions of release:

(1) - “The defendant must not violate, state, or local law while on release.”

WHEREFORE, in view of the aforementioned, it is respectfully requested that the Court take notice of the contents of this motion, and that a warrant for defendant’s arrest be issued so that he may be brought before this Honorable Court to show cause as to why his bail supervision should not be revoked.

In San Juan, Puerto Rico, this 29th day of June 2021.

Respectfully submitted,

LUIS ENCARNACION-CANALES, CHIEF
U.S. PROBATION OFFICER

s/Franklin Castillo-Fernandez
Franklin Castillo-Fernandez
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CERTIFICATE OF SERVICE

I HEREBY certify that I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties in this case.

In San Juan, Puerto Rico, this 29th day of June 2021.

s/ Franklin Castillo-Fernandez

Franklin Castillo-Fernández

U.S. Probation Officer